## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In Re:	§	
	§	<b>Civil Action No. 4:22-cv-00664</b>
	§	
KP ENGINEERING, LP	§	
Debtor	§	Bankruptcy Case No. 19-3707
	§	
CREDOS INDUSTRIAL SUPPLIES &	§	
RENTALS, LLC	§	
Appellant	§	

## UNOPPOSED MOTION OF APPELLANT, CREDOS INDUSTRIAL SUPPLIES & RENTALS, LLC d/b/a CREDOS FABRICATIONS FOR AN EXTENSION OF TIME TO FILE APPELLANT'S BRIEF

Appellant, Credos Industrial Supplies & Rentals, LLC d/b/a Credos Fabrications ("Appellant") respectfully moves this Court for the entry of an order extending the time for it to file its Appellant's Brief, up to and including Friday, May 13, 2022. Counsel for Appellant has conferred with counsel for Appellee, Joshua Wolfshohl, and Appellee does not oppose the requested extension. In further support of this Motion, Appellant states as follows:

- 1. On March 11, 2022, Appellant filed its Designations of Record and Statement of Issues on Appeal.
  - 2. Appellant's Brief is presently due to be filed on or before April 27, 2022.
- Appellant has requested and Appellee has agreed to an extension up and through
   May 13, 2022 to file its Appellant's Brief. Good cause exists for this request.
  - 5. This request for extension is not sought for delay, but so that justice may be done.
  - 6. This is Appellant's first requested extension.

WHEREFORE, Appellant respectfully requests that the Court extend the time by which it must file its Appellant's Brief up to and including May 13, 2022.

Respectfully submitted,

By: /s/Michael P. Ridulfo
Michael P. Ridulfo
Texas Bar No. 16902020
KANE RUSSELL COLEMAN LOGAN PC
5051 Westheimer Road, Suite 1000

Houston, Texas 77056 Telephone: (713) 425-7442 Fax: (713) 425-7700

E-mail: mridulfo@krcl.com

COUNSEL FOR CREDOS INDUSTRIAL SUPPLIES & RENTALS, LLC d/b/a CREDOS FABRICATIONS

## **CERTIFICATE OF CONFERENCE**

I certify that on April 18, 2022, the undersigned conferred with Appellee's counsel, Joshua Wolfshohl, who advised that this Motion is unopposed.

/s/Michael P. Ridulfo
Michael P. Ridulfo

## **CERTIFICATE OF SERVICE**

I certify that on April 20, 2022, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/Michael P. Ridulfo
Michael P. Ridulfo